

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
CENTRAL DIVISION

KASEY FOX, et al.

PLAINTIFFS

vs.

No. 4:19-cv-37-KGB

TTEC SERVICES CORP.

DEFENDANT

NOTICE OF RIGHT TO JOIN LAWSUIT

FROM: Mr. Josh Sanford
SANFORD LAW FIRM, PLLC
One Financial Center
650 South Shackleford Road, Suite 411
Little Rock, Arkansas 72211
Telephone: (501) 221-0088
Facsimile: (888) 787-2040
E-mail: josh@sanfordlawfirm.com
Attorneys for Plaintiff

TO: All hourly-paid Healthcare Advocates at any time since January 17, 2016.

RE: Fair Labor Standards Act lawsuit against TTEC Services Corp.

(1) TIME-SENSITIVE: Because the right to claim unpaid wages expires after three years, your right to unpaid wages may depend on the date on which you return the enclosed *Consent* form.

(2) INTRODUCTION: The purpose of this notice is to inform you of a pending collective action lawsuit in which you may be a member as a Plaintiff; to advise you of how your rights may be affected by this suit; and to instruct you on the procedure for participating in this suit.

(3) DESCRIPTION OF THE LAWSUIT: Plaintiffs in this case are Healthcare Advocates for TTEC Services Corp. (hereinafter "Defendant"). Plaintiffs filed a lawsuit against Defendant asserting that Defendant violated federal law in failing to pay its Healthcare Advocates correctly.

Defendant denies Plaintiffs' claims and allegations. Defendant asserts that it complied with the law, and properly compensated all of its Healthcare Advocates.

IMPORTANT: CONSENT DUE BY _____, 2020

This case has not yet been set for trial. If the case is not settled between the parties, a trial will be held at the United States District Court for the Eastern District of Arkansas in Little Rock. The Court has not ruled on or decided any of the issues, including the merits of the claims or defenses.

(4) COMPOSITION OF THE CLASS: Plaintiffs seek to sue on behalf of themselves and on behalf of all Healthcare Advocates who were employed by TTEC Services Corp. at any time since January 17, 2016.

(5) YOUR RIGHT TO PARTICIPATE IN THIS SUIT: If you fit the definition above, you may join this suit (that is, you may opt-in) provided that you file or cause to be filed the attached *Consent to Join* Collective Action **on or before _____, 2020**.

Additional *Consent to Join* forms and information regarding the specific filing requirements are available from Plaintiffs' attorney, Josh Sanford, Sanford Law Firm, PLLC, One Financial Center, 650 South Shackleford Road, Suite 411, Little Rock, Arkansas 72211, (501) 221-0088, josh@sanfordlawfirm.com.

(6) EFFECT OF JOINING THIS SUIT: If you choose to join this suit, you will be bound by the judgment whether it is favorable or unfavorable. While the suit is proceeding you may be required to provide information, sit for depositions, and testify in court. You will not be required to pay attorney's fees directly. Plaintiffs' attorney will receive a part of any money judgment or settlement entered in favor of the class.

It is important to understand that you may be entitled to recovery just because you were employed by Defendant as a call center employee at some time since January 17, 2016. The Court will make a final decision about whether you are entitled to recover, and for what time period, if any, that you are entitled to recover. The Court has not made those decisions as of yet.

(7) EFFECT OF NOT JOINING THIS SUIT: If you choose not to join this suit, you will not be affected by the settlement of this case or any judgment, favorable or unfavorable. If you choose not to join this suit, you are free to file your own lawsuit. If you do not join this suit, however, its filing will not stop the running of the statute of limitations (deadlines) applicable to any claims you may have against Defendant within the scope of the suit. If those deadlines expire before you file your own lawsuit, you may lose your rights. Accordingly, if you desire to file your own lawsuit, you should contact an attorney to preserve whatever rights you may have.

IMPORTANT: CONSENT DUE BY _____, 2020

(8) CLASS COUNSEL: If you choose to join this suit, the named Plaintiff through her attorney will represent your interests. Plaintiff's attorney and the attorney for the class is:

Mr. Josh Sanford
Sanford Law Firm, PLLC
One Financial Center
650 South Shackleford Road, Suite 411
Little Rock, Arkansas 72211
Telephone: (501) 221-0088
Facsimile: (888) 787-2040
E-mail: josh@sanfordlawfirm.com

You also have a right to hire your own attorney and pursue your potential claims individually. If you sign a *Consent to Join* you agree that the attorney for the class will represent you in this case.

(9) FURTHER INFORMATION: Further information about this suit, your rights to join in this action, information about filing a *Consent to Join*, and additional *Consent to Join* forms can be obtained by contacting Josh Sanford at (501) 221-0088 or josh@sanfordlawfirm.com.

(10) RETALIATION PROHIBITED: The law prohibits anyone from discriminating or retaliating against you for taking part in this case. If you believe you have been discriminated or retaliated against in any way as a result of your receipt of this notice or election to participate in this lawsuit, you should contact your attorney immediately.

(11) EFFECT OF SEVERANCE: If you are a former employee of TTEC Services Corp., you should not be discouraged from participating in this lawsuit merely because you may have signed a severance agreement or similar release upon or following termination of your employment. The impact that this type of agreement has on any claims you may have against TTEC Services Corp., is an issue to be decided by the Court.

IMPORTANT: CONSENT DUE BY _____, 2020